

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:
LeClairRyan PLLC,
Debtor.

Case No.
19-34574-KRH
Chapter 7

NOTICE OF MOTION AND HEARING THEREON IF NECESSARY

PLEASE TAKE NOTICE that Rodney K. Adams, John T. Jessee, Paul C. Kuhnel, and Andrew K. Clark (collectively, the “Joiners”), by counsel, filed the following: **RODNEY K. ADAMS, JOHN T. JESSEE, PAUL C. KUHNEL, AND ANDREW K. CLARK’S JOINDER TO GARY D. LECLAIR’S MOTION TO AMEND DEBTOR’S EQUITY SECURITY HOLDERS LIST PURSUANT TO BANKRUPTCY RULE 1009(A)** (the “Joinder”)[ECF No. 1237].

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Joinder carefully and discuss it with your attorney if you have one in this chapter 7 Case. (If you do not have an attorney, you may wish to consult one).

PLEASE TAKE FURTHER NOTICE that on September 4, 2019, the Court entered the *Order Establishing Certain Notice, Case Management and Administrative Procedures* [ECF. No. 38] (the “Case Management Order”), which approved the Notice, Case Management, and Administrative Procedures attached as Exhibit 1 to the Case Management Order (the “Case Management Procedures”). The Case Management Procedures, among other things, prescribe the manner in which Objection must be filed and served and set forth when certain hearings will be conducted. A copy of the Case Management Order may be obtained, free of charge, by written request to pberan@tb-lawfirm.com, or, for a fee, at <http://ecf.vaeb.uscourts.gov>.

PLEASE TAKE FURTHER NOTICE if you do not want the Court to grant the relief requested in the Joinder, or if you want the Court to consider your views on the Joinder, on or before **March 22, 2022 (the “Objection Deadline”)**, you or your attorney must:

File with the Court, either electronically or at the address shown below, a written response to the Joinder pursuant to Rule 9013-1(H) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the Case Management

Michael E. Hastings, Esq. (VSB No. 36090)
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*Counsel for Rodney K. Adams, John T. Jessee,
Paul C. Kuhnel, and Andrew K. Clark*

Procedures. If you mail your written response to the Court for filing, you must mail it early enough so the Court will receive it on or before the Objection Deadline.

If a response is not properly and timely filed and served, the Court may deem any opposition waived, treat the Joinder as conceded and enter an appropriate order granting the requested relief without further notice or hearing.

Clerk of the Court
United States Bankruptcy Court
701 East Broad Street, Suite 4000
Richmond, VA 23219

In accordance with the Case Management Procedures, you must also serve a copy of your written Objection on the Core Parties, the 2002 List Parties and any Affected Entity so that the Objection is received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT the Court will entertain the Joinder on **March 29, 2022 at 11:00 a.m.** (or such time thereafter as the matter may be heard). **REMOTE HEARING INFORMATION: Due to the COVID-19 public health emergency, no in-person hearing are being held. This hearing will take place remotely through Zoom. To appear at the hearing, you must use the following Zoom registration link:**

<https://www.zoomgov.com/meeting/register/vJItd-GvqDkvH4cmJbXkjNKZZrN-Pfd4nbg>

Listen-only conference line:
Dial 1-866-590-5055
Access Code: 4377075
Security Code: 32922

PLEASE NOTE: You MUST submit the Zoom Request Form no later than two (2) business days prior to this hearing. Any documentary evidence presented at the hearing must be filed with the Court in advance of the hearing. **PLEASE GOVERN YOURSELVES ACCORDINGLY.**

Dated: March 7, 2022

Respectfully submitted,

RODNEY K. ADAMS, JOHN T. JESSEE,
PAUL C. KUHNEL, AND ANDREW K. CLARK

By: /s/ Michael E. Hastings
Of Counsel

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Counsel for the Joiners

CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2022, a true and correct copy of the foregoing document was filed with the Court through the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Michael E. Hastings